

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

CODY C. EDRINGTON,

Plaintiff,

v.

RYDER GLOBAL SERVICES, LLC,  
a/k/a RYDER INTEGRATED  
LOGISTICS, INC.,

Defendant,

v.

QUENTIN D. CAMPBELL,

Defendant.

Case No. \_\_\_\_\_

**NOTICE OF REMOVAL**

Defendants, Ryder Global Services, LLC, a/k/a Ryder Logistics, Inc. hereby removes Case No. CI 20-2346 from the County Court of Buffalo County, Nebraska to the United States District Court for the District of Nebraska Pursuant to 28 U.S.C. §§ 1332, 1441, & 1446, and as grounds for the removal states as follows:

**STATEMENT OF THE CASE**

1. On December 23, 2020, Plaintiff Cody C. Edrington filed a Complaint in the County Court of Buffalo County, Nebraska, entitled *Cody C. Edrington, Plaintiff, v. Ryder Global Services, LLC, a/k/a Ryder Integrated Logistics, Inc., Defendant, v. Quentin D. Campbell, Defendant.*
2. Defendant Ryder Global Services, LLC, a/k/a Ryder Logistics, Inc., a Florida corporation, was served by certified mail on January 5, 2021.
3. This notice was timely filed.

4. A copy of all Process, Pleadings, and Orders served upon Defendant in the County Court action are attached in support of this filing.

**DIVERSITY JURISDICTION UNDER 28 U.S.C. §1332, § A & C**

5. This Court has jurisdiction over this matter under 28 U.S.C. § 1332 (a) because there is complete diversity of citizenship between Plaintiff and Defendant Ryder Global Services, LLC, a/k/a Ryder Logistics, Inc. a Florida corporation, and Defendant Quentin D. Campbell, and more than \$75,000.00 exclusive of interests and costs is at stake. Plaintiff has alleged specific damage amount for past medical expenses and Plaintiff also alleges that he has incurred future medical expenses, past and future pain and suffering, loss of wages and loss of future capacity to earn wages, and permanent injury and future disabilities, putting the amount in controversy above the \$75,000.00 diversity jurisdictional threshold.
6. Plaintiff alleges that he is a resident of the state of Idaho and that his primary residence is in Iona, Bonneville County, Idaho.
7. Defendant Ryder Global Services, LLC, a/k/a Ryder Logistics, Inc. a Florida corporation, is organized under the laws of the state of Florida, with its principal place of business in Miami, Florida.
8. Defendant Quentin D. Campbell is a resident of the state of New Jersey and his primary residence is in Newark, Essex County, New Jersey.

WHEREFORE, Defendants, Ryder Global Services, LLC, a/k/a Ryder Logistics, Inc. a Florida corporation, and Quentin D. Campbell, respectfully request that this action be removed to United States District Court for the District of Nebraska.

DATED February 4th, 2021.

RYDER GLOBAL SERVICES, LLC, a/k/a  
RYDER LOGISTICS, INC., Defendant

BY: /s/ Terrance O. Waite  
Terrance O. Waite, #15497  
FOR: WAITE & McWHA  
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Attorney for the Defendant

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 4th day of February, 2021, a true and correct copy of the foregoing was served by email and regular US Mail, postage prepaid, upon the following:

Stephanie Flynn  
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Defendant

/s/ Terrance O. Waite  
Attorney for Defendant